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Abraham Backenroth, Esq.
(212 593-1100)
*Counsel for Bram Will El LLC and
William Muschel, LLC Debtors,*

Hearing Date: October 26, 2010
Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

In re:

BROADWALL AMERICA, INC.,

Debtor.

Chapter 11
Case No. 04-13810 (JMP)

----- X

In re:

BRAM WILL EL LLC,

Debtor.

Chapter 11
Case No. 05-10616 (JMP)

----- X

In re:

WILLIAM MUSCHEL, LLC,

Debtor.

Chapter 11
Case No. 05-10617 (JMP)

----- X

BROADWALL AMERICA, INC.,

Plaintiff,

-against-

BRAM WILL EL LLC, and
WILLIAM MUSCHEL, LLC,

Adv. Pro. No. 06-01788 (JMP)
Adv. Pro. No. 06-01789 (JMP)
Adv. Pro. No. 06-01790 (JMP)

Defendants.

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REPLY OF BRAM WILL EL LLC & WILLIAM MUSCHEL, LLC, .

BRAM WILL EL LLC and WILLIAM MUSCHEL, LLC (collectively, the “Muschel Debtors”), debtors and debtors-in possession in the above proceedings and defendants in the three

above-captioned consolidated adversary proceedings (the “Adversary Proceedings”) as and for their reply in opposition to the objection dated October 22, 2010 (the “Objection”) filed by Aaron Muschel (“Aaron Muschel”) and in further support of the joint motion to approve settlement and dismiss proceedings, state as follows:

1. The Reply of Broadwall America, Inc., dated October 22, 2010 adequately deals with the objections interposed by Aaron Muschel and need not be repeated here. There was, however, one issue which was not addressed – the issue of corporate authority.

2. I am attaching hereto as Exhibit A, a copy Ruben Muschel’s written authorization, which was, in addition to the oral authorization received from him, to enter into this settlement. It is therefore a non-issue.

Dated: New York, New York
October 25, 2010

Backenroth Frankel & Krinsky LLP

By: /s/ Abraham Backenroth
Abraham Backenroth Esq.(AB-1989)
489 Fifth Avenue – 28th Floor
New York, New York 10017

*Attorney for Bram Will El LLC and
William Muschel, LLC Debtors*

Exhibit A

June 17, 2010

To: Abraham Backenroth
From: Ruben Muschel

Re: Bram Will-El, LLC
William Muschel, LLC

This is to confirm that I, Ruben Muschel, individually, as an executor of my father's estate, hereby authorize you to sign a stipulation dismissing the above bankruptcy proceedings and to transfer the shares and/or ownership interest in the above entities to my brother Mordechai Muschel in accordance with the Psak Beth din

William Muschel probate estate

Ruben Muschel
Ruben Muschel, Individually, and as
Executor